

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

LE-VEL BRANDS LLC,

Plaintiff,

v.

SHYLO ECKSTROM,

Defendant.

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CASE NO. 3:18-cv-01352-S

DECLARATION OF KEVIN T. SCHUTTE

COUNTY OF DALLAS §
 §
STATE OF TEXAS §

I hereby declare as follows:

1. “My name is Kevin T. Schutte. I am a member in good standing of the Texas Bar and have been licensed to practice law in the State of Texas since 2001. I am a partner with the law firm of Shapiro Bieging Barber Otteson LLP (“SBBO”), and I have personal knowledge of the facts herein.

2. The statements contained herein are based on my personal knowledge and based on my review of documentation maintained and kept by SBBO in the ordinary course of business.

3. This Declaration is being prepared in support of Le-Vel Brands, LLC’s (“Le-Vel”) request for attorneys’ fees as a result of having to file its Motion for Contempt and for Sanctions in light of Defendant Shylo Eckstrom’s conduct.

4. Le-Vel retained SBBO to represent it in the above-captioned matter. For this engagement, Le-Vel agreed to pay SBBO a reasonable fee at SBBO’s standard hourly rates.

5. My billing rate for the representation of Plaintiff Le-Vel is \$450.00 per hour. The billing rate of Will Dunne is \$335.00 per hour.

6. The billing rates in this matter are reasonable when compared to the hourly rates charged in the Dallas/Fort Worth metropolitan area, when compared to attorneys with like or similar years of experience and background, and when considering the complexity of the work performed.

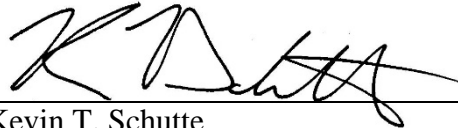
7. A summary of the fees incurred by Le-Vel in responding to is as follows:

Attorney	Total Hours	Hourly Rate	Fees
Kevin T. Schutte	8	\$450.00	\$3,600.00
Will Dunne	15	\$335.00	\$5,025.00
TOTAL FEES SOUGHT			\$8,625.00

8. If additional briefing is required to reply to Defendant's response, Le-Vel will incur additional fees not likely to exceed \$5,000.00. The fees incurred by Le-Vel for this matter are necessary and reasonable."

I declare under penalty of perjury under to laws of the State of Texas that the foregoing is true and correct.

Executed on this 10th day of May, 2019,



Kevin T. Schutte
Attorney for Le-Vel Brands, LLC